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28 September 2022

**National  
Trust**

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[via email to [A303Stonehenge@planninginspectorate.gov.uk](mailto:A303Stonehenge@planninginspectorate.gov.uk)]

Dear Mr O'Hanlon

**Application by National Highways for an Order granting Development Consent for the A303 Amesbury to Berwick Down (Stonehenge) scheme.**

**REQUEST FOR COMMENTS FROM ALL INTERESTED PARTIES**

('SoS letter' of 14 September 2022)

We are writing in response to your letter dated 14 September 2022 seeking comments on National Highways' (the "Applicant") [response](#) to your letter of 26 August 2022 and the Final Report on the joint World Heritage Centre / ICOMOS / ICCROM Advisory Mission to Stonehenge, Avebury and Associated Sites (c.373bis) 19 - 21 April 2022 ("the Report"). The National Trust has reviewed the materials and welcomes the opportunity to comment.

**The Report & Advisory Mission**

We take our role as custodians of the Stonehenge Landscape very seriously and therefore attach great value to its standing as a World Heritage Site (WHS) and to the opinions of the UNESCO World Heritage Committee. Finding a solution to the existing, damaging, surface road is complex, as UNESCO has acknowledged in its reports. The existing A303 severely damages the World Heritage Site, impacting hundreds of ancient monuments. The road severs the landscape, is an obstacle to exploring the site and is dangerous to visitors. It severely harms the Outstanding Universal Value of the site. The current situation cannot

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continue. Many prominent voices, including UNESCO and its advisory bodies, have called for the removal of the current road, but for over 30 years these attempts have stalled.

We were grateful for the chance to be able to show the Advisory Mission delegation around the Stonehenge Landscape earlier this year, to showcase our work caring for the landscape, and discuss the Government's proposed tunnel project. As in our previous submissions, we call on all parties to work together to agree practical solutions to the points raised by the Mission Advisors in their Report.

## **The Report Findings**

*'From the perspective that an objective of the Scheme is to minimize any harm to the OUV of the inscribed property, the Mission considers that additional weight should be afforded to avoiding impact on the property, in view of its 'Outstanding Universal Value' and the obligations of the State Party under the World Heritage Convention. The Mission considers that the appropriate 'test' is not whether there is a net benefit to OUV, but rather how any adverse impact on OUV can be avoided.'*

As landowners and custodians of approximately one third of the Stonehenge, Avebury and Associated Sites WHS we attach great value to the opinions of the UNESCO World Heritage Committee, and the recommendations given by the Mission Advisors in the Report. We acknowledge the Applicant's response but would also expect the Secretary of State to have regard to the World Heritage Committee's decisions in redetermining the DCO application. However, we recognise that the decision of whether to grant or refuse consent for the DCO Scheme is ultimately one for the Secretary of State.

*'Notwithstanding the invitation provided in the 'Statement of Matters' issued on behalf of the Secretary of State for Transport dated 30 November 2021, and recent Decisions of the World Heritage Committee, no further consideration or analysis of alternatives has been offered by National Highways. Such alternatives would need to be considered in order to explore fully the available opportunities to avoid impacts on OUV.'*

We acknowledge the Applicant's statement in their response to the Secretary of State, that they have provided information on options assessment and consideration of alternatives at various points in the development of the DCO Scheme.

We welcome the publication of the two tunnel extension alternatives submitted by the Applicant in response to the Secretary of State's letter of 20 June 2022 (Redetermination documents 4.2 - 4.8).

Although these are not being promoted by the Applicant, were they deliverable, they would appear to address UNESCO recommendations. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all

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parties to consider whether and how any elements of these alternatives, of benefit to the World Heritage Site, could be brought forward in the detailed design of the scheme, should consent be granted.

*'The State Party has ratified the World Heritage Convention and its Articles, and the Decisions of the World Heritage Committee are directly relevant to decision-makers within the State Party; therefore the findings and recommendations of this 2022 Advisory Mission report and the forthcoming Decision of the World Heritage Committee at its 45th session are directly relevant to consideration by the State Party authority for the re-determination of the Scheme's Development Consent Order application.'*

We would expect the Secretary of State to have regard to the World Heritage Committee's decisions in redetermining the DCO application. At the present time the 45<sup>th</sup> session of the World Heritage Committee is yet to meet, and no date for that meeting has yet been secured. We welcome the opportunity to comment on the findings and recommendations of the 2022 Advisory Mission report, and the Report's inclusion in the materials to be considered by the Secretary of State in making their decision. However, we recognise that the decision of whether to grant or refuse consent for the DCO Scheme is ultimately one for the Secretary of State.

## **The Report Recommendations**

*'1. In view of the Outstanding Universal Value (OUV) of the 'Stonehenge, Avebury and Associated Sites' property, and the iconic nature of the Stonehenge component (the WHS) in particular, if the A303 Amesbury to Berwick Down Road project (the Scheme) is approved and implemented the State Party should do all in its power to comply with Decisions of the World Heritage Committee.'*

As landowners and custodians of approximately one third of the Stonehenge, Avebury and Associated Sites WHS we attach great value to the opinions of the UNESCO World Heritage Committee, and the recommendations given by the Mission Advisors in the Report. We would expect the Secretary of State to have regard to the World Heritage Committee's decisions and for the Government and the Applicant to work with all parties to consider what measures could be brought forward to address the Recommendations in the Report, should consent be granted.

*'2. While the Mission accepts that the Scheme to upgrade the A303 with the dual carriageway passing through the heart of the WHS with a tunnel, is the result of methodical and detailed analysis of options to respond to a complex set of demands and needs including those of the communities and villages around the WHS; nevertheless, in order to avoid adverse impacts on OUV, should the Scheme not proceed, the State Party should revisit alternative surface road options to consider*

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*whether one of them might be adapted to remove through traffic from the WHS, thereby minimizing adverse impacts on the OUV of the property, while also responding to the other complex demands and needs.'*

We recognise the process of option identification and selection detailed in the Applicant's response, and acknowledge the rationale given.

*'3. The proposed western portal of the current Scheme, and associated dual carriageway within a cutting, should not proceed without substantial amendment to avoid adverse impacts on the WHS and the OUV of the World Heritage property, to the fullest extent that is reasonably practicable.'*

We attach great value to the opinions of the UNESCO World Heritage Committee, and the recommendations given by the Mission Advisors in the Report. We would expect the Secretary of State to have regard to the World Heritage Committee's decisions in redetermining the DCO application.

We note the Applicant's assessment of the two alternative tunnel extensions set out in Redetermination documents 4.2 - 4.8 that both would have an improved beneficial effect on the World Heritage Site (Outstanding Universal Value, Integrity and, in the case of the bored tunnel option, Authenticity). And that in the area that forms the focus of this Recommendation of the Report; Winterbourne Stoke Crossroads Barrows (AG12), The Diamond Group (AG13) and Normanton Down Barrows (AG19) would all be, '*subject to significant positive changes to setting in comparison to the DCO Scheme.*' (Redetermination documents 4.3, paragraph 8.3.3 and 4.4, paragraph 8.3.3).

In the Applicant's response to the Secretary of State's letter of 26 August 2022 the Applicant states that, '*both alternatives come with new significant adverse environmental effects, traffic implications, and substantial increased costs.*' But we note that the Applicant's Environmental Appraisal and their Outline Heritage Impact Appraisals (Redetermination documents 4.3, 4.4, 4.5 & 4.6), themselves only very high-level assessments, acknowledge that they may be overstating new adverse effects, which with further development of these alternatives could potentially be avoided or reduced through design mitigation measures.

Although these tunnel extension alternatives are not being promoted by the Applicant, were they deliverable, they would appear to address this Recommendation. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all parties to consider whether and how any element of these alternatives, of benefit to the World Heritage Site, could be brought forward in the detailed design of the scheme, should consent be granted.

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*'4. If the Scheme proceeds, the underground section of the western approach (tunnel and/ or cut-and-cover) should be extended, to at least to the western edge of the WHS boundary.'*

Although the tunnel extension alternatives set out in Redetermination documents 4.2 - 4.8 are not being promoted by the Applicant, were they deliverable, they would appear to address UNESCO recommendations. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all parties to consider whether and how any element of these alternatives, of benefit to the World Heritage Site, could be brought forward in the detailed design of the scheme, should consent be granted.

*'5. The western portal should be re-located as far to the west as reasonably practical, thereby reducing the length of the cut-and-cover section and minimising the extent of archaeological resources which must be removed.'*

We note that the lateral Limits of Deviation of the draft DCO (version made November 2020, quashed July 2021) allow for the western portal to be moved 200m to the west (closer to the western boundary of the World Heritage Site). We would support the use of this option were it to be pursued in the detailed design of the scheme, should consent be granted.

*'6. There should be a comprehensive archaeological salvage program, consistent with best practice standards and approaches; with methodology, extent, cost and timing determined based on expert advice about what is needed to achieve to achieve comprehensive archaeological salvage.'*

We acknowledge the Applicant's response to the Secretary of State concerning this Recommendation. The National Trust has participated fully in the Heritage Monitoring and Advisory Group, and the Scientific Committee. We will continue to engage with the Applicant via these fora to ensure a comprehensive archaeological mitigation programme ('archaeological salvage') is delivered consistent with best practice, and to the standards befitting a World Heritage Site.

*'7. In the event that unexpected archaeological finds were to occur during the course of the comprehensive archaeological salvage program, provision should be made to stop work and evaluate options for improved conservation outcomes, including public communication of discoveries.'*

We acknowledge the Applicant's response to the Secretary of State concerning this Recommendation. Should the scheme be consented, and unexpected archaeological finds

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be made we would provide advice to the Applicant and their contractors as set out in the Detailed Archaeological Mitigation Strategy (DAMS) paragraphs 6.1.10 and 6.5.8. to ensure optimum conservation outcomes.

Should the DCO Scheme be consented, we will also continue to engage with the Applicant and their contractors in the provision of advice on the Public Archaeology and Community Engagement (PACE) Strategy, via our role on the PACE Project Board.

*'8. The proposed Longbarrow junction should be re-located further to the west, insofar as this is practically possible.'*

We welcome the publication of the two tunnel extension alternatives submitted by the Applicant in response to the Secretary of States letter of 20 June 2022 (Redetermination documents 4.2 - 4.8), both of which posit the re-location of the proposed Longbarrow Junction further to the west.

Although these alternatives (and the alternative more westerly location of the proposed Longbarrow Junction) are not being promoted by the Applicant, were they deliverable, they would appear to address this Recommendation. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all parties to consider whether and how any element of these alternatives, of benefit to the World Heritage Site, could be brought forward in the detailed design of the scheme, should consent be granted.

*'9. If the Scheme proceeds, a monitoring regime should be established to identify any changes to the water table which affect Blick Mead, and any such changes should be addressed through a process of adaptive management.'*

We welcome this Recommendation, and note the measures set out in the Applicant's response to the Secretary of State concerning this Recommendation.

*'10. Appropriate community access, which is respectful of local interest groups and sensitivities, should be provided to Blick Mead, Vespasian's Camp, The Avenue and Amesbury Park, all of which should also be interpreted to enhance visitor experience of the WHS and its environs.'*

We acknowledge the principle of enabling appropriate community access to the World Heritage Site where this is possible. We also acknowledge the Applicant's response to the Secretary of State concerning this Recommendation. Of the sites and monuments identified in this Recommendation the National Trust owns a significant proportion of the Stonehenge Avenue, the majority of which is already in permissive open access. The remaining portion

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of the Avenue that is in our ownership is undergoing chalk grassland restoration work. Our ambition is that all of the Avenue within our ownership will, as conservation needs allow, become permissive open access.

*'11. If the Scheme proceeds, the Scientific Committee should be requested and empowered to instigate and facilitate ongoing discussions and consideration of the most appropriate methods to achieve comprehensive archaeological investigation and salvage of archaeological features and deposits.'*

We welcome this Recommendation. We also acknowledge the Applicant's response to this Recommendation. But we would offer the correction that since the start of the Coronavirus (COVID-19) pandemic, though Scientific Committee Meetings with the Applicant have taken place, these have not taken place quarterly.

*'12. The current representation on the HMAG should be augmented with addition of further expertise in cultural landscape conservation, management and interpretation.'*

We recognise the need for appropriate cultural landscape conservation, management, and interpretation expertise. We also acknowledge the Applicant's response to the Recommendation and can confirm that HMAG is made up of organisations rather than individuals. And that the organisations represented on HMAG (including the National Trust) possess considerable depth of expertise in cultural landscape conservation, management, and interpretation that can be drawn upon.

*'13. If the Scheme proceeds, the rights of private farmers within the WHS should be pro-actively protected, including careful attention to new visitor opportunities and circulation patterns, and minimising ancillary impacts.'*

We recognise and acknowledge the need to consider the rights of all landholders within the World Heritage Site. We also acknowledge the Applicant's response to the Recommendation.

*'14. If the Scheme proceeds, the WHS should not be used for substantial temporary activities such as construction compounds, to the fullest extent practicable.'*

We welcome this Recommendation and acknowledge the Applicant's response.

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*'15. If the Scheme proceeds, all lighting arrangements for the tunnel and the surface of the WHS following the closure of the surface road of A303 should be carefully designed for safety as well as for preserving the 'night sky', an important attribute of the Neolithic and Bronze-age funerary site.'*

We welcome this Recommendation and acknowledge the Applicant's response. Should the DCO Scheme be consented we will continue to engage with the Applicant through our role on HMAG and as a consultee as set out in the Outline Environmental Management Plan (OEMP) to ensure the protection of the OUV of the WHS.

*'16. Commercial signs should be prohibited within the WHS.'*

We acknowledge the Applicant's response. Should the DCO Scheme be consented we will continue to engage with the Applicant through our role on the Stakeholder Design and Consultation Group (SDCG), as set out in the OEMP, to ensure the protection of the OUV of the WHS.

*'17. The State Party should ensure that this report is provided in a timely manner to all parties and individuals who may be involved in decision-making or implementation of the Scheme.'*

We welcome this Recommendation and acknowledge the Applicant's response.

*'18. Revised plans for the Scheme, the rationale for specific changes, and details of the comprehensive archaeological salvage program should be submitted to the World Heritage Centre, for review by the Advisory Bodies, prior to implementation, in accordance with paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention.'*

We acknowledge the Applicant's response. Our expectation would be that any revision to plans and / or rationale for specific changes would be submitted to the World Heritage Centre as a matter of ongoing engagement. And should the DCO Scheme be consented we would urge the State Party (DCMS) to submit the Site Specific Written Schemes of Investigation, Heritage Management Plans and Archaeological Method Statements, secured in the draft DCO (DAMS paragraphs 6.1.3 – 6.1.10) to the World Heritage Centre for their information, once they have been approved by Wiltshire Council (in Consultation with Historic England).

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*'19. As a decision-maker within the State Party, which has ratified the World Heritage Convention, the responsible State Party authority should address obligations arising under the World Heritage Convention and Decisions of the Committee, in exercising the role of consent authority for the Scheme.'*

As landowners and custodians of approximately one third of the Stonehenge, Avebury and Associated Sites WHS we attach great value to the World Heritage Convention, and the opinions of the UNESCO World Heritage Committee. We would expect the Secretary of State to have regard to the World Heritage Committee's decisions in redetermining the DCO application. However, we recognise that the decision of whether to grant or refuse consent for the DCO Scheme is ultimately one for the Secretary of State.

*'20. The responsible State Party authority should await the Decision of the World Heritage Committee at its 45th session before re-determining the Scheme's Development Consent Order application.'*

We would expect the Secretary of State to have regard to the World Heritage Committee's decisions in redetermining the DCO application. But we also acknowledge that at the present time the 45th session of the World Heritage Committee is yet to meet, and no date for that meeting has yet been secured or published. We recognise that the decision of whether, and when to grant or refuse consent for the DCO Scheme is ultimately one for the Secretary of State.

*'21. A Development Consent Order should only be issued for the Scheme on the basis that it can and will be modified in accordance with the Findings and Recommendations of this Mission report, including provision for the underground section of the western approach to be extended, to at least the western edge of the WHS boundary, and assurance of the necessary funding by the State Party, to allow such an extension to occur.'*

Although the viable tunnel extension alternatives set out by the Applicant in response to the Secretary of State's letter of 20 June 2022 (Redetermination documents 4.2 - 4.8) are not being promoted by the Applicant, if they were deliverable, they would appear to address UNESCO recommendations in relation to the western tunnel approach.

The National Trust agrees with the Applicant's assessment that both these options would have an improved beneficial effect on the World Heritage Site (Outstanding Universal Value, Integrity and, in the case of the bored tunnel option, Authenticity). We note that the Applicant's Environmental Appraisal and their Outline Heritage Impact Appraisals (Redetermination documents 4.3, 4.4, 4.5 & 4.6), themselves only very high level assessments, acknowledge that they may be overstating new adverse effects, which with

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further development of these alternatives could potentially be avoided or reduced through design mitigation measures.

The Applicant has stated they: *“will [...] ensure the DCO Scheme [...] is delivered with heritage and the Outstanding Universal Value of the WHS at the heart of every decision made. We acknowledge that the Mission still has concerns with the western portal approach. The provisions contained within the draft DCO [...] allow for refinement of the DCO Scheme to ensure that opportunities identified with potential to minimise adverse impacts or maximise beneficial impacts on the WHS are acted upon.”*

However, despite the alternatives having an improved beneficial effect on the WHS, the Applicant also states: *“the additional cost of each alternative over and above the DCO Scheme would not deliver meaningful additional benefits to the WHS that would justify either alternative being taken forward.”*

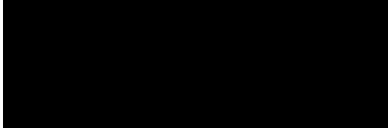
The Department for Culture, Digital, Media & Sport (DCMS), in the 2022 [State of Conservation Report](#), has also stated that: *“The State Party [DCMS] would welcome the opportunity to explore the commitments and opportunities to continue to refine the scheme’s design in a manner that could reduce the extent and width of the open cut at the western end of the WHS with the World Heritage Centre and the Advisory Bodies.”* And *“Subject to detailed design, there may be further opportunities to mitigate the residual impacts of the cutting...”*

These statements taken together, suggest that the Applicant and Government consider it possible to improve the DCO Scheme, post consent, for the benefit of the WHS, and to address UNESCO’s recommendations. But it is unclear where the extent of this improvement could fall on a spectrum of opportunities between the tunnel extension alternatives, and the DCO Scheme. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all parties to consider whether and how any element of these alternatives, of benefit to the World Heritage Site, could be brought forward in the detailed design of the scheme, should consent be granted.

To ensure that the Applicant can and is obligated to develop these opportunities to *‘minimise adverse impacts or maximise beneficial impacts on the WHS’* to the fullest extent possible, we urge the Secretary of State to consider bringing forward drafting in Requirement 3 of the draft DCO (version made November 2020, quashed July 2021) to allow for both the broadest scope of improvement to be made, and to ensure the detailed design process will bind the Applicant to reducing the exposed cutting within the WHS to the maximum extent deliverable, and minimising the extent of archaeological resource which would be removed.

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Yours sincerely



Nick Simms  
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